

1 GAYLE A. KERN, ESQ.
Nevada Bar No. 1620
2 KAREN M. AYARBE, ESQ.
Nevada Bar No. 3358
3 KERN & ASSOCIATES, LTD.
4 5421 Kietzke Lane, Ste. 200
Reno, Nevada 89511
5 Tel: (775) 324-5930
6 Fax: (775) 324-6173
Email: karenayarbe@kernltd.com
7 *Attorneys for Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 HSBC BANK USA, NATIONAL Case No.: 3:17-cv-00514-MMD-VPC
11 ASSOCIATION, as Trustee for Wells Fargo
12 Asset Securities Corporation, Mortgage Pass-
Through Certificates, Series 2006-18;

13 Plaintiff,

14 vs.

15 MICHAEL GRIBOSKI, an individual; CODY
16 LOGAN, an individual; LAKE VILLAGE
17 HOMEOWNERS ASSOCIATION, a Nevada
18 non-profit corporation; and GAYLE A. KERN,
LTD., a Nevada professional corporation, d/b/a
Kern & Associates, Ltd.;

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR GAYLE A.
KERN, LTD. DBA KERN &
ASSOCIATES, LTD. TO ANSWER
OR OTHERWISE RESPOND TO
COMPLAINT**

[Third Request]

19 Defendants.
20 _____/

21 **IT IS HEREBY STIPULATED** between Plaintiff, HSBC Bank USA, National
22 Association, as Trustee for Wells Fargo Asset Securities Corporation, Mortgage Pass-Through
23 Certificates, Series 2006-1 ("Plaintiff"), by and through its counsel, Snell & Wilmer LLP, and
24 Defendant, Gayle A. Kern, Ltd. dba Kern & Associates, Ltd. ("Kern"), by and through its counsel
25 Kern & Associates, Ltd., to extend the deadline for Kern to answer or otherwise respond to
26 Plaintiff's Complaint on or before January 19, 2018.

27
28 Plaintiff filed its Complaint on or about August 24, 2017, and Kern was served on or about

1 October 18, 2017. By virtue of a prior extension, the current deadline for Kern to answer or
2 otherwise respond to the Complaint is on December 22, 2017.

3 Plaintiff and Kern (collectively referred to as the "Parties") stipulate and agree to extend
4 the deadline for Kern to answer or otherwise respond to the Complaint on or before January 19,
5 2018. Counsel for the Parties continue to communicate in good faith and believe they have reached
6 agreements on the majority of the issues between them. However, due to varying holiday schedules
7 of the Parties and/or counsel, the Parties are unable to resolve the remaining issues and file the
8 necessary documents as contemplated by the current December 22, 2017 deadline. In a continued
9 effort to conserve the time and resources of the Parties and the Court, this third extension is
10 requested. Good cause exists for the extension, which is not intended to cause delay or prejudice
11 to any party.
12

13
14 DATED this 21st day of December, 2017. DATED this 21st day of December, 2017.

15 ***KERN & ASSOCIATES, LTD.***

16 /s/ Karen M. Ayarbe, Esq.

17 KAREN M. AYARBE, ESQ.

18 Nevada Bar No. 3358

19 5421 Kietzke Lane, Ste. 200

20 Reno, NV 89511

21 *Attorneys for Defendant Gayle A. Kern,
22 Ltd. dba Kern & Associates, Ltd.*

SNELL & WILMER, LLP

/s/ Adam Tully, Esq.

ADAM TULLY, ESQ.

Nevada Bar No. 13601

3883 Howard Hughes Pkwy, Ste. 1100

Las Vegas, NV 89169-5958

*Attorneys for Plaintiff HSBC Bank USA,
National Association*

ORDER

23 ***IT IS SO ORDERED.***

24 DATED this 21 day of December 2017.

25 
United States Magistrate Judge

26 ***Respectfully Submitted By:***

27 /s/ Karen M. Ayarbe, Esq.

28 KAREN M. AYARBE, ESQ.

Attorneys for Defendant Gayle A. Kern, Ltd. dba Kern & Associates, Ltd.

CERTIFICATE OF SERVICE

Pursuant to the Fed. R. Civ. Proc. 5(b) and the United States District Court CM/ECF Electronic Filing Procedure IV(B), a true and correct copy of the foregoing ***STIPULATION AND ORDER TO EXTEND DEADLINE FOR GAYLE A. KERN, LTD. DBA KERN & ASSOCIATES, LTD. TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT (Third Request)*** was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

RYAN WILLIAM LEARY

rleary@laxalt-nomura.com
wrawson@laxalt-nomura.com

TANYA N. LEWIS

tpeters@swlaw.com
DOCKET_LAS@swlaw.com
nriley@swlaw.com
DOCKET_SLC@swlaw.com
dwithers@swlaw.com

HOLLY S PARKER

hparker@laxalt-nomura.com
rleary@laxalt-nomura.com
kmartin@laxalt-nomura.com

ROBIN E PERKINS

rperkins@swlaw.com
mawilliams@swlaw.com
DOCKET_LAS@swlaw.com
sdugan@swlaw.com

ADAM Q. TULLY

atully@swlaw.com
plarsen@swlaw.com
lluxford@swlaw.com
DOCKET_LAS@swlaw.com
sdugan@swlaw.com

JAMES M WALSH

jmwalth@wbri.net
awalsh@wbri.net
dvollmer@wbri.net

DATED this 21st day of December, 2017.

/s/ Christine A. Lamia

An Employee of Kern & Associates, Ltd.